

1 MELANIE A. HILL, ESQ.
Nevada Bar No. 8796
2 **MELANIE HILL LAW PLLC**
520 S. 7th Street, Suite A
3 Las Vegas, NV 89101
Tel: (702) 362-8500
4 Fax: (702) 362-8505
Melanie@MelanieHillLaw.com
5 *Attorney for Plaintiff Jeffrey Alan James*

6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 *****

10 JEFFREY ALAN JAMES, an individual and
11 resident of Nevada,

12 Plaintiff,

13 v.

14 CITY OF HENDERSON, a municipal
corporation, DETECTIVE K. LAPEER
15 (#1446), DETECTIVE K. LIPPISCH (#1710),
DETECTIVE W. NICHOLS (#1242), and
16 Defendant DOE OFFICERS I-X, inclusive,

17 Defendants.
18

Case No. 2:19-cv-01207-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSE TO MOTION TO
DISMISS [ECF No. 5]**

(Third Request)

19 Counsel for Plaintiff, Melanie A. Hill of Melanie Hill Law PLLC, and counsel for
20 Defendants, Brandon P. Kemble, Assistant City Attorney for the Henderson City Attorneys' Office,
21 respectfully submit the following stipulation and order to extend the deadline for Plaintiff to file his
22 opposition to the Defendants City of Henderson, Detective K. Lapeer, Detective K. Lippisch, and
23 Detective W. Nichols' Motion to Dismiss [ECF No. 5] filed on July 18, 2019 for forty-five days
24 from the current deadline of October 18, 2019 to December 2, 2019.¹

25 ///

26 ///

27 ¹ The 45-day deadline falls on Sunday, December 1, 2019, making the next business day December 2, 2019.
28

1 Due to constant lock down at the jail, counsel for Plaintiff has not heard from the Plaintiff
2 regarding what attorney he would like to substitute in her place in this case. Counsel for Plaintiff is
3 also not able to communicate with Plaintiff because the jail is constantly on lock down and therefore
4 Counsel for Plaintiff will be seeking to withdraw by separate motion. To avoid any prejudice to
5 Plaintiff, the parties have stipulated to extend the deadline for Plaintiff to prepare and file his
6 opposition.

7 **IT IS HEREBY STIPULATED AND AGREED** between the parties that the deadline for
8 Plaintiff to file his opposition to the Defendants' Motion to Dismiss [ECF No 5] be extended forty-
9 five days from its current deadline of October 18, 2019 to December 2, 2019.

10 DATED this 21st day of October, 2019.

11 MELANIE HILL LAW PLLC

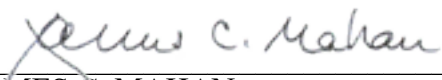
HENDERSON CITY ATTORNEY

12
13 By: /s/ Melanie A. Hill
14 Melanie A. Hill, Esq.
15 Nevada Bar No. 8796
16 520 S. 7th Street, Suite A
17 Las Vegas, Nevada 89101
18 Telephone: (702) 362-8500
19 Facsimile: (702) 362-8505
20 Melanie@MelanieHillLaw.com
21 *Attorneys for Plaintiff Pamela Dittmar*

By: /s/ Brandon Kemble
Brandon Kemble, Esq.
Nevada Bar No. 11175
240 Water Street, MSC 144
Henderson, Nevada 89015
Telephone: (702) 267-1200
Facsimile: (702) 267-1201
Brandon.Kemble@cityofhenderson.com
Attorneys for Defendants

18 **IT IS SO ORDERED.**

19 Dated October 22, 2019.

22
23 
24 JAMES C. MAHAN
25 UNITED STATES DISTRICT JUDGE
26
27
28